

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-3, 9-31, 34-45, and 51-67 are pending in this application. Claims 64 and 66 have been added by way of the present amendment. No new matter has been added.

In the outstanding Office Action, Claims 64-67 were rejected under 35 U.S.C. §112, second paragraph; Claims 1-3, 9-11, 13-31, 34, 35, 37-45, 51-53, and 55-63 were rejected under 35 U.S.C. §103(a) as unpatentable over Hirai et al. (U.S. Patent Publication No. 2004/0021890, hereinafter “Hirai”) in view of Haraguchi (U.S. Patent No. 7,102,777); and Claims 12, 36, and 54 were rejected under 35 U.S.C. §103(a) as unpatentable over Hirai, Haraguchi, and further in view Parry et al. (U.S. Patent No. 7,542,160, hereinafter “Parry”).

As an initial matter, the “Office Action Summary” has not indicated whether the certified copies of the priority documents have been received. It is respectfully submitted that the Patent Application Information Retrieval (PAIR) system indicates that priority document(s) have been received by the United States Patent and Trademark Office (USPTO) on May 15, 2006. Thus, Applicants respectfully request that the Office confirm, in subsequent communications, that the certified copies of the priority document(s) have been received.

With regard to the 35 U.S.C. §112, second paragraph, rejection of Claims 64-67, as a result of the present response, Claims 64 and 66 no longer recite the term “arbitrary,” thereby rendering this rejection moot. Thus, it is respectfully requested this rejection be withdrawn.

Addressing now the rejection of Claims 1-3, 9-11, 13-31, 34, 35, 37-45, 51-53, and 55-63 under 35 U.S.C. §103(a) as unpatentable over Hirai and Haraguchi, Applicants respectfully traverse this rejection.

Claim 1 recites, in part,

a controlling unit configured to execute an operation using an application within the external apparatus by communicating with the external apparatus by the communicating unit when the communicating unit receives from the external apparatus an operation execution request that is issued by the application and requests execution of the operation using the application, the operation providing an image processing function using at least one of the plurality of hardware resources specified by the application;

an authenticating unit configured to carry out, using authentication information that is added to the operation execution request, an authentication process to confirm validity of the operation execution request when the communicating unit receives the operation execution request from the external apparatus, the authentication information including identification information unique to the application, and the authenticating unit confirming that the operation execution request is valid if the identification information matches the identification information that is stored in the storage unit; and

an operation execution permitting unit configured to permit execution of the operation if the authenticating unit confirms that the operation execution request is valid.

In the “Response to Arguments” section, the Office Action disagrees with Applicants’ position that Hirai merely proposes a user authentication process and not an application authentication process. Applicants respectfully request the Office reconsider its position.

To briefly summarize, Hirai describes an apparatus that can send an authentication result of a user by using a calling procedure, such that the authentication result of the user can be used by various compound machines, PCs, and management servers on a network.¹

At paragraphs [0093]-[0099], Hirai first performs user authentication, and if the user authentication is successful, confirms the use restriction of the application with respect to the authenticated user. It is respectfully submitted that the user authentication is clearly different from the application authentication of Claim 1, because the user authentication authenticates the user, and *not* the application. In other words, *authenticating a user* (i.e., a person who instructs a process to be performed in the compound machine),” as described in Hirai is

¹ Hirai: paragraph [0010].

unrelated to and does not correspond with *authenticating an external application* (i.e., an application within the external apparatus that provides an image processing function using one or more hardware resources within the compound machine),” as is recited in Claim 1.

Further, the use restriction of the application merely indicates whether the user may use the application. Hence, confirming the user restriction of the application is clearly different from the application authentication of Claim 1, because confirming the use restriction of the application merely confirms *whether the user may use the application*, and not the *validity of the* (operation execution) *request* issued from an application within an external apparatus.

In other words, Claim 1 authenticates the validity of an operation execution request by using identification information which is unique to an application, whereas Hirai merely confirms whether a user may use an application.

Next, the Office Action disagrees with Applicants’ position that the asserted combination of Hirai and Haraguchi fails to teach or suggest an application within an external apparatus. Applicants respectfully request the Office reconsider its position.

To briefly summarize, Haraguchi describes a system in which an image processing apparatus communicates with various services, such as an image processing service, an accounting service, an advertisement service, a content service, and a maintenance service.²

The Haraguchi reference is cited by the Office to show an example of an external application executed by an electronic apparatus. However, as is shown in Haraguchi’s Figure 8, the image processing apparatus makes a service request related to the use of an application, to an external service provider. According to Haraguchi, if the service provider confirms that the received service request is from a registered image processing apparatus, the service

² Haraguchi: Figure 2.

provider sends to the image processing apparatus a processed result using the application within the service provider.³

In other words, although in Haraguchi the application is provided within the service provider, external to the image processing apparatus, it is the image processing apparatus that makes the service request, and **not** an external application within the service provider. Furthermore, the confirmation process of Haraguchi is performed by the service provider and **not** by the image processing apparatus.

Nonetheless, the Office Action cites column 6, lines 20-25 of Haraguchi as discussing a system that allows services “to operate and perform any device in the network and most particularly servers remote to the peripherals.”

The aforementioned section of Haraguchi recites the following:

[I]image processing services may be provided by a dedicated service over a network or may be provided by an image processing device. The image processing service can be utilized by a provider (image processing apparatus) itself or can be utilized by another image processing apparatus via a network.

However, the location where the image processing service is provided or used in Haraguchi is different from the location where the application is provided, because the “service” and the “application” are different. Hence, Haraguchi does not teach or suggest, at least, an application within the external apparatus, which issues an operation execution request that requests execution of an operation using the application, with respect to the electronic apparatus, as recited by Claim 1.

Accordingly, even if the confirmation process carried out by the service provider of Haraguchi were applied to the system of Hirai, this would still be different from the application authentication of Claim 1.

³ Haraguchi: column 5, lines 31-45.

Finally, the Office Action disagrees with Applicants' position that the asserted combination of Hirai and Haraguchi fails to teach the operation providing an image processing function using at least one of the plurality of hardware resources specified by the application. Applicants respectfully request the Office reconsider its position.

The Office Action asserts that paragraph [0042] of Hirai "teaches that request from 'upper layers' include determining whether specified resources needed to perform the requests are available," and that Hirai's "applications are upper layer entities which are performing said request."

However, paragraph [0042] of Hirai merely describes that a request from an upper layer within the image forming apparatus requests the hardware resources. As described above, the application in Hirai is provided within the image forming apparatus. Hence, Hirai does not describe or suggest, at least, the operation providing an image processing function using at least one of the plurality of hardware resources specified by the application within the external apparatus, as is recited in Claim 1.

Hence, Applicants respectfully submit that Hirai and Haraguchi, whether taken alone or in combination, do not describe, suggest, or render obvious the features of independent Claim 1. Additionally, Applicants respectfully note that Hirai and Haraguchi also do not describe, suggest, or render obvious the features of independent Claim 29, for reasons similar to those discussed above. In particular, Hirai and Haraguchi also fail to teach or suggest "executing an operation using an application within the external apparatus when an operation execution request that is issued by the application and requests execution of the operation using the application is received from the external apparatus, the operation providing an image processing function using at least one of a plurality of hardware resources within the electronic apparatus and specified by the application, [and] carrying out, using authentication information that is added to the operation execution request, an authentication process to

confirm validity of the operation execution request when the operation execution request is received from the external apparatus, the authentication information including identification information unique to the application, and the authentication process confirming that the operation execution request is valid if the identification information matches identification information that is registered in advance in a storage unit within the electronic apparatus.”

Furthermore, Applicants respectfully note that Hirai and Haraguchi also do not describe, suggest, or render obvious the features of Claim 43, for reasons similar to those discussed above. Specifically, Hirai and Haraguchi fail to teach or suggest “executing, using a controlling function, an operation using an application within the external apparatus by communicating with the external apparatus by the communicating function when an operation execution request that is issued by the application and requests execution of the operation using the application is received from the external apparatus by the communicating function, the operation providing an image processing function using at least one of a plurality of hardware resources within the electronic apparatus and specified by the application, [and] carrying out, using an authenticating function and using authentication information that is added to the operation execution request, an authentication process to confirm validity of the operation execution request when the communicating function receives the operation execution request from the external apparatus, the authentication information including identification information unique to the application, and the authenticating function confirming that the operation execution request is valid if the identification information matches identification information that is registered in advance in a storage unit of the electronic apparatus.”

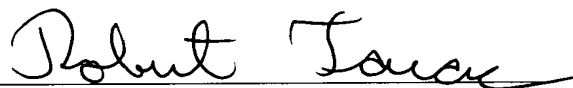
Accordingly, Applicants respectfully request the rejection of Claims 1, 29, and 43, and claims depending respectively therefrom, be reconsidered and withdrawn.

Therefore, it is respectfully submitted that pending Claims 1-3, 9-31, 34-45, and 51-67 are allowable.

Consequently, in view of the present amendment, and in light of the above discussion, the pending claims as presented herewith are believed to be in condition for formal allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, L.L.P.



James J. Kulbaski
Attorney of Record
Registration No. 34,648

Customer Number

22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 07/09)

Robert Tarcu
Registration No. 64,622